



Former Charters Garage, Oxford Rd, Tilehurst, Reading RG31 6TQ, United Kingdom

Planning application for the development of 32 dwellings, including 10 affordable housing units with associated parking and landscaping following the demolition of the existing buildings

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Reading Borough Council

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1.0 Introduction

- 1.1 DTM Planning has been instructed by Maxika Homes Ottershaw to prepare an application for the development of the former Charters Garage at Oxford Road, Tilehurst, Reading.
- 1.2 The application site comprises the former Charters Car Garage and Dealership, which includes a number of buildings along with associated parking. The site currently comprises a showroom, workshop, wash bay, and a large forecourt.
- 1.3 The application is for a full redevelopment of the site. The proposal comprises of 32 dwellings with associated parking and landscaping. The proposal also includes a policy compliant level of affordable housing equating to 10 dwellings.
- 1.4 The property is situated on the north side of Oxford Road (A329), in a predominately residential location.
- 1.5 The application is supported by the following:
 - Design and Assess Statement
 - Character Assessment
 - Planning Statement
 - Ecology report including BNG assessment
 - Arboricultural assessment
 - Noise Survey
 - Air quality assessment
 - Landscape plans
 - Contamination report
 - Energy statement
 - Existing and proposed site plans
 - Existing and proposed floor plans
 - Existing and proposed elevations.

2.0 Site and Surroundings

- 2.1 The application site comprises the former Charters Car Garage and Dealership, which includes several buildings along with associated parking. The site currently comprises a showroom, workshop, wash bay, and large forecourt. The property is situated on the north side of Oxford Road, Tilehurst in a predominately residential location.
- 2.2 The property comprises a large site totaling 0.33 ha. The depth of the site is circa 29m at its maximum with a width of circa 105m.



Image 1 – Site Location

- 2.3 The image above illustrates that the site sits within a heavily defined residential area with a mix of semi-detached and detached dwellings to the South of Oxford Road. There is a mix of plot sizes with buildings oriented to face the roads and gardens located to the rear of the properties.
- 2.4 Tilehurst train station is a 3-minute walk which provides direct train services to Reading Mainline Station and the Elizabeth Line to the east, and Didcot Parkway and Oxford to the west. The property is also within easy reach of Junction 12 (3.5 miles away) and Junction 11 (7 miles away) of the M4 Motorway.
- 2.5 To the north of the site is the railway line but this is screened from the site by virtue of a bank of mature trees located immediately to the north of the site.

- 2.6 To the northwest of the site there are substantial two and half storey buildings which form the character of the northern section of Oxford Road. The image below shows the properties immediately to the northwest with the subject site in the background.



Image 2 – Street Scene to the northwest

- 2.7 The image below shows the existing buildings on the site when view from the southeast of the site.



Image 3 – View from the southeast

2.8 The wider site is allocated under Policy WR3r of the Local Plan 2019, which states that development should:

- Provide access to the site from Lippincote Court
- Avoid adverse visual impacts on views from the north side of the Thames and on the Thames Valley major landscape feature
- Avoid detrimental impacts on the wildlife value of adjoining wooded areas
- Address air quality impacts on residential use
- Address noise impacts on residential use
- Address any contamination on site, and
- Take account of the two-storey character of houses south of Oxford Road.

3.0 Planning History

- 3.1 Application 190984 - Demolition of old workshop building and construction of new workshop building – Approved.

4.0 The Proposal

- 4.1 The site is located in a predominantly residential area. Based on the residential character of the area and in particular to the North of Oxford Road, it would be suitable to replace the disused garage buildings with a residential development of 2-3 storey in scale. Taking precedence from the development on plots 1032 to 1040 Oxford Road and the Roebuck Hotel, the scheme proposes a creation of flats within four blocks of development.
- 4.2 The proposal to replace the now closed garage site with blocks of flats, complements the immediate context of residential properties. The proposal is developed to include outdoor amenity spaces that complement the character of the residential properties.
- 4.3 The concept of the scheme is to keep the building blocks within a footprint that suits the size of the site and sympathetic to the neighbouring properties, whilst maximising the opportunity the site presents in a highly sustainable location.
- 4.4 The proposed spaces are designed to national space standards, relevant local planning policies and building regulations. The end design resulted into 32 units in a total of four blocks of flats with a mix of:
- 8 x 1 bed 2- person flats
 - 16 x 2 bed 3-person flats
 - 4 x 2 bed 4-person flats and
 - 4 x 3 bed 5- person flats.
- 4.5 Blocks 1 and Block 2 are the same in size and number of units. Each block consists of 8 No. flats of 2 bed 3-person.
- 4.6 Block 3 consists of 8 No. flats with a mix of 1 bed 2-person and 2 bed 4-person units.
- 4.7 Block 4 consists of 8 No. flats with a mix of 1 bed 2-person and 3 bed 5-person units.
- 4.8 The proposed dwelling mix represents a density of 96 units per hectare
- 4.9 The proposed blocks are oriented along the East - West axis with the front of the properties facing Oxford Road. The proposed scheme maintains an offset from Oxford Road arranged to follow the existing street line and scale formed by the Plots 1032 to 1040 Oxford Road and the former Roebuck Hotel to the northwest.



Image 4 – Proposed street scene

- 4.10 The residential blocks 1 and 2 sit approximately 6m away from the public footpath and blocks 3 and 4 sit approximately 4m away from the public footpath along Oxford Road. The separation distance allows for the introduction of soft landscaping to the front of the properties.
- 4.11 The scheme allows for direct access from Oxford Road past the pedestrian walkway leading to the front door access. Pedestrian access into the basement car parking is between blocks 2 and 3, whilst vehicular access is afforded via ramped access from Oxford Road, with suitable vision splays maintained. There is also provision for surface level car parking located to the right of the site boundary with access from Lippincote Court.
- 4.12 The external amenity spaces include a mix of private and shared spaces adjacent to the entrances of the units. The amenity to the rear can be accessed through a footpath between the ramp and block 3 and to the East between the car parking area and block 4. There are also more pockets of shared amenity spaces all around the site.
- 4.13 The private amenity spaces to rear of the blocks 1 and 2 are accessed by the ground floor flats. Similarly, the private amenity spaces to the rear of blocks 3 and 4 are accessed by the ground floor flats. The landscaping to the rear of blocks 3 and 4 provide the residents with a shared amenity space.



Image 5 – Proposed layout

- 4.14 The proposal has made considerations to improve the existing hardscaping which occupies most of the site at present. The overall aim is to encourage soft landscaping around the buildings. The proposal includes soft landscaping to the front of the buildings as indicated on the site layout plan above. The low-level planting maintains the site's openness from the existing street elevation, and it is also follows a similar pattern to the relatively new development to the northwest of the site.
- 4.15 The stretch of green to the rear allows for residents to enjoy an outdoor walk in a shared amenity space, for use of the residents only. This is accessed from the street level and continues through the car parking area. The proposal is to maintain the existing mature trees and improve the planting along the rear boundary. Any new planting will be of native species to the area to encourage local biodiversity and improve the green outlook of the properties.
- 4.16 The proposed permeable hardscaping forms the driveways and car parking areas for the scheme, and areas of pedestrian access to the front of the properties and private terraces to the rear.
- 4.17 The proposal is 2 storeys in scale with 'accommodation within the roof space', taking architectural cues and lines from the neighbouring properties to the northwest.
- 4.18 Indeed, the roof form of the neighbouring properties have inspired the proposed design. The objective has been to create a proposal that respects the nature of residential properties. To accomplish this, the scheme has considered the site levels, the ridge heights of the proposed scheme are lower than the neighbouring on plots. The main roof is sloped back from the dwelling seen at the front elevation and at the rear and side elevations.

- 4.19 The site is accessed off Oxford Road to the South. The proposal provides for 12 on ground car parking spaces to the east end of the site and 32 basement parking spaces below blocks 1 and 2.
- 4.20 The proposal provides for secure and sheltered cycle storage to accommodate 20 No. cycles following Reading Borough Council's cycle parking guidance for 0.5 spaces for 1-2 bed flats and 1 cycle space for 3+bed flats. The ground floor units can store their bikes in the private rear garden spaces.
- 4.21 It is proposed to provide a policy compliant level of affordable housing on site with 10 of the units being affordable dwellings. The exact location and mix of the units have not been agreed at this stage with the Councils affordable housing team. Discussions will begin as soon as the application is validated.

5.0 Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy Framework (NPPF) - among them the 'presumption in favour of sustainable development', which means 'approving development proposals that accord with an up-to-date development plan without delay' (NPPF paragraph 11).
- 5.2 For this Local Planning Authority, the development plan is the Reading Borough Local Plan (2019). The relevant national / local policies / guidance are:
- 5.3 National Planning Policy Framework 2023. The following chapters are considered relevant:
- 2 - Achieving sustainable development
 - 4- Decision-making
 - 5- Delivering a sufficient supply of homes
 - 6- Building a strong, competitive economy
 - 8- Promoting health and safe communities
 - 11- Making effective use of land
- 5.4 Reading Borough Local Plan (November 2019) policies are:
- CC1: Presumption in Favour of Sustainable Development
 - CC2: Sustainable Design and Construction
 - CC3: Adaptation to Climate Change
 - CC4: Decentralised Energy
 - CC5: Waste Minimisation and Storage
 - CC6: Accessibility and the Intensity of Development
 - CC7: Design and the Public Realm
 - CC8: Safeguarding Amenity
 - CC9: Securing Infrastructure
 - EN9: Provision of Open Space
 - EN10: Access to Open Space
 - EN12: Biodiversity and the Green Network
 - EN14: Trees, Hedges and Woodland
 - EN15: Air Quality
 - EN16: Pollution and Water Resources
 - EN17: Noise Generating Equipment
 - EN18: Flooding and Drainage
 - EM3: Loss of Employment Land
 - H1: Provision of Housing
 - H2: Density and Mix

- H3: Affordable Housing
- H10: Private and Communal Outdoor Space
- H14: Suburban Renewal and Regeneration
- OU1: New and Existing Community Facilities
- TR1: Achieving the Transport Strategy
- TR3: Access, Traffic and Highway-Related Matters
- TR4: Cycle Routes and Facilities
- TR5: Car and Cycle Parking and Electric Vehicle Charging
- WR1: Charters Car Sales WR3

5.5 Supplementary Planning Documents-

- Affordable housing 2021
- Revised Parking Standards and Design (2011)
- Planning Obligations under Section 106
- Sustainable Design and Construction (2019)

6.0 Planning Assessment

6.1 The main planning issues to consider are as follows:

- Land use consideration
- Density and Housing Mix
- Provision of Affordable Housing
- Design considerations
- Residential amenity
- Environmental protection matters
- Transport and highways
- Natural Environment
- Ecology
- Sustainability
- Drainage
- S106 and Cil
- Planning Balance.

6.2 In the following paragraphs we will assess the proposal against the key planning issues outlined above and the associated planning policy. The statement will conclude with a discussion of the planning balance which needs to be applied to any decision.

Land Use Considerations – principle of development

- 6.3 Policy CC1 (Presumption in favour of Sustainable Development) requires a positive approach to development proposals that reflect the presumption in favour of sustainable development, which lies at the heart of the National Planning Policy (NPPF). To achieve sustainable development a proposal needs to meet economic, social and environmental objectives. It is considered that a proposal for new housing would contributing to providing sufficient land for housing, a range of homes and would make effective use of land.
- 6.4 A key Government objective is to significantly boost the supply of new homes (Section 5 of the NPPF) and the local housing requirement as set out within Policy H1 (Provision of Housing) which confirms that there is a pressing need for additional housing in Reading and the surrounding area.

- 6.5 The wider principle of re-development of this site is established under Local Plan housing allocation Policy WR1 and specifically WR3r which allocates the site for residential development as follows:

Development for residential. The development should:

- *Provide access to the site from Lippincote Court;*
- *Avoid adverse visual impacts on views from the north side of the Thames;*
- *Avoid detrimental impacts on the wildlife value of adjoining wooded areas;*
- *Address air quality impacts on residential use;*
- *Address noise impacts on residential use;*
- *Address any contamination on site; and*
- *Take account of the two-storey character of houses south of Oxford Road.*

- 6.6 The Site size is 0.33 ha and the policy outlines that the site can accommodate between 12-18 dwellings.

Loss of employment

- 6.7 As the site is allocated for housing in accordance with Policy WR1, there is no requirement to justify the loss of the employment use in this case.

Principle of residential development

- 6.8 The proposed development, providing 32 residential units on previously development land, would contribute towards meeting the Council's housing need requirements in accordance with Policy H1.
- 6.9 Given the above, the principle of providing residential accommodation at the site is supported by the site allocation. The proposal is considered to represent a valuable development opportunity which can positively contribute to meeting the Borough's ongoing housing needs.

Density and Housing Mix

- 6.10 The NPPF seeks to 'boost significantly the supply of housing' and deliver a wide range of homes, of different types and tenures. Achieving an efficient use of the land within the context of any central and sustainability located site is a key priority both at a national and local level. The NPPF states that LPAs should actively "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value". The land in question is a former garage and is not of high environmental value. However, it is located in a highly sustainable location. Having regard to guidance contained in updated NPPF 2023, there is strong support for an ambitious approach to density on such sites.

- 6.11 Policy H2 (Density and Mix) specifically considers density and mix and requires that an appropriate density of residential development is informed by the character and mix of uses in the area in which it is located and its current and future level of accessibility.

Density

- 6.12 The proposed development is for 32 dwellings. This equates to 96 dwellings per hectare (ha) (32 dwellings on a 0.33 ha site).
- 6.13 The proposed 32 dwellings are higher than the figure envisaged by the Site Allocation (12-18 dwellings). However, as Policy H2 recognises, the appropriate density of residential development will be informed by a range of factors, including the character and mix of uses of the area, the housing mix, the need to achieve high quality design, site accessibility, and the need to minimise environmental impacts. As such, density should not be considered in isolation - it is a useful indicator in seeking to meeting housing targets, but not necessarily as good an indicator of the likely form, quality, or appropriateness of a scheme.
- 6.14 Policy H2 outlines indicative densities of above 100dph for Town Centre and 80-120dph for Urban areas. The density proposed lies within the parameter for an urban area. It is considered that there are complimentary amenities such as shops in proximity which can cater for the greater number of units proposed.
- 6.15 The sites current and future level of accessibility by walking, cycling and public transport, - with respect to Policy CC6, (Transport) and the separate transport assessment outline the detail of the site's excellent access to road, public transport, cycle and pedestrian access. Therefore, it is considered that the potential of the site should be maximised for delivering housing.
- 6.16 Policy H2 (iv) outlines the need to maximise the efficiency of land use. The great need for additional, well located, sustainable and high-quality housing in Reading means that the potential of sites such as this should be maximised. We consider this has been achieved while still providing buildings in harmony with the local context.
- 6.17 The original allocation for 12-18 dwellings suggests a scheme of dwellings rather than flats, however, the shape of the plot is the main element which directs the proposal towards a flatted scheme rather than a scheme of family dwellings. For example, the recent development to the north at 1030-1040 Oxford Road is an example of a scheme for 6 No. dwellings as outlined below.



Image 6 – Layout of 1030-1040 Oxford Road

- 6.18 The image above illustrates that owing to the depth of the site and due to the mature trees, which are located along the northern boundary of the site, the dwellings are served by very small rear gardens which are overshadowed. The garden spaces provided, while sufficient in size for flats, are simply not large enough for 3/4-bedroom family dwellings.
- 6.19 It is considered that the development of 1030-1040 Oxford Road would not have been approved under current planning policy owing to the restricted rear gardens provided. The subject site, which is allocated for residential development faces similar constraints to the above site in relation the depth of the site and the mature trees which are located immediately to the north of the site.
- 6.20 Our clients initially looked at a scheme of dwellings on site, but the shape of the site simply does not lend itself to the provision of dwellings houses as evidenced by the development of 1030-1040 Oxford Road next door.
- 6.21 However, as Policy H2 recognises, the appropriate density of residential development will be informed by a range of factors, including the character and mix of uses of the area, the housing mix, the need to achieve high quality design, site accessibility, and the need to minimise environmental impacts. As such, density should not be considered in isolation - it is a useful indicator in seeking to meeting housing targets, but not necessarily as good an indicator of the likely form, quality, or appropriateness of a scheme.

- 6.22 In this case it is considered that the proposed site is more suited to high density form of flatted development. The shape of the site is not conducive to dwellings owing to the depth of the property and the need to retain significant separation to Oxford Road.
- 6.23 From a safety element, the site fronts onto the busy through road to Reading and it considered that this is an unsafe area for younger children. Family homes should not be located off of an A road for safety reasons alone. This is another factor which supports the principle of flats on this site.
- 6.24 Although not mentioned specifically in policy H2, viability also plays a major role in determining the density of development of any site. This will be discussed in greater detail in the planning balance section at the end of this statement but since this site was originally allocated for housing, rising build costs owing to Brexit, Covid 19, and the ongoing conflicts in Ukraine and the Middle East have devastated the construction industry. The development of this site for a maximum of 18 units with 30% affordable is simply not viable in the current financial climate.
- 6.25 Moreover, the significant remediation works that will need to be undertaken prior to any works taking place add further costs any development. These factors were not in place when the original allocation was made.
- 6.26 It is considered that there is policy support at National level for a greater level of development on this site that the original allocation suggests.
- 6.27 The shape, layout, and surrounding constraints of the site dictate that the only form of development that is suitable on this is a scheme of flats.
- 6.28 Once again, the stark reality is that the subject site cannot and will not come forward for development at the level outlined in the original allocation as this is simply not a viable proposition.

Housing Mix

- 6.29 The proposals include 8 x 1 bed 2- person flats/ 16 no. 2 bed 3-person flats/ 4 no. 2 bed 4-person flats and 4 no. 3 bed 5- person flats. Policy H2 (Density and Mix) identifies that wherever possible, residential development should contribute towards meeting identified needs in respect of housing mix, and in particular, for family homes of 3 or more bedrooms. The Policy seeks that at least 50% of the homes outside centres will be 3 bed or larger.
- 6.30 The site is located outside a town centre and therefore the policy is for at least 50% of the homes to be 3 bed or larger. The proposal provides 4 x 3 bed units which equates to 12.5%. The proposal also provides a further 12.5% 2 bed/ 4 person units which are also classed family sized units. With a provision of 25% of the units being family sized units, the scheme falls significantly short of the 50% requirement.

- 6.31 However, the policy is quite clear that the preferred mix should be provided wherever possible. As this document will demonstrate. It is simply not feasible or indeed viable for this site to come forward for development at the level outlined in the current allocation and to meet the Councils preferred housing mix and affordable housing targets.
- 6.32 The site, by reason of its depth and width is not conducive to providing family dwellings in the first instance. Therefore, to maximise its location, adjacent to Tilehurst Station, it is considered that a high-density development of flats is the only viable option for the development of this site. Unfortunately, this will mean approving a scheme which does not meet the Councils required housing mix.

Provision of Affordable Housing

- 6.33 Affordable Housing is a key identified priority within the Borough. Policy H3 (Affordable Housing) seeks to ensure that development proposals of more than 10 dwellings should provide the equivalent of 30% on-site provision of affordable housing.
- 6.34 The Council's updated Affordable Housing SPD (2021) requires that new development should include a range and mix of tenures of affordable housing (as appropriate depending on site size) to reflect local needs. Specifically, the SPD identifies a tenure mix of 38% shared ownership and 62% rented, with rented allowed to be Affordable rent but capped at 70% of Market Rent ('Reading Affordable Rent') is required to meet the Borough's most pressing needs.
- 6.35 The proposed development would provide 10 affordable housing units, which equates to 30% of the total dwellings on-site designated Affordable Housing.
- 6.36 The exact mix and location of the units has not been outlined at this stage. We will engage with the Affordable Housing Officer on this element once the application has been submitted.
- 6.37 Therefore, while the scheme does not meet the Councils preferred housing mix, our clients have ensured that the proposal will meet the Councils requirements for the provisions of affordable housing.

Design Considerations – Demolition, Layout, Scale and Appearance

- 6.38 The application is supported by a detailed design and access statement which outlines the concept of the design from the original sketches to the finished scheme. A comprehensive character assessment also demonstrates how the application has been designed to respect the character and appearance of the surrounding area.
- 6.39 Policy CC7 (Design and the Public Realm) seeks to ensure that new development enhances and preserves the local character. The policy places importance on the layout of the urban structure and urban grain, stipulating that development should respond positively to the local context and create safe and accessible environments. The policy requires a "high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located".

- 6.40 Paragraph 130 of the NPPF 2021 details that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment.
- 6.41 The images below illustrate the site as it exists. The application site comprises the former Charters Car Garage and Dealership, which includes a number of buildings along with associated parking. The site currently comprises a showroom, workshop, wash bay, and a large forecourt.
- 6.42 In relation to the demolition of the existing buildings at the site, these are not considered to be of any architectural merit to warrant their retention either individually or cumulatively. Their loss would not result in any harm to the character and appearance of the area, providing they are replaced with buildings of high-quality design. Demolition is, therefore, considered acceptable subject to the proposed replacement buildings being suitable in design and related matters detailed below.



Image 7 – View from the southeast of the site



Image 8 – Proposed street scene

- 6.43 The design of the scheme is separated into four blocks. The proposed blocks are oriented along the East - West axis with the front of the properties facing Oxford Road. Each of the proposed blocks is split into four units, which each present themselves as split-level maisonettes. This means that each block houses eight dwellings.
- 6.44 The proposed scheme maintains an offset from Oxford Road with the blocks arranged to follow the existing street line and scale formed by the Plots 1032 to 1040 and the Roebuck Hotel along the North of Oxford Road.

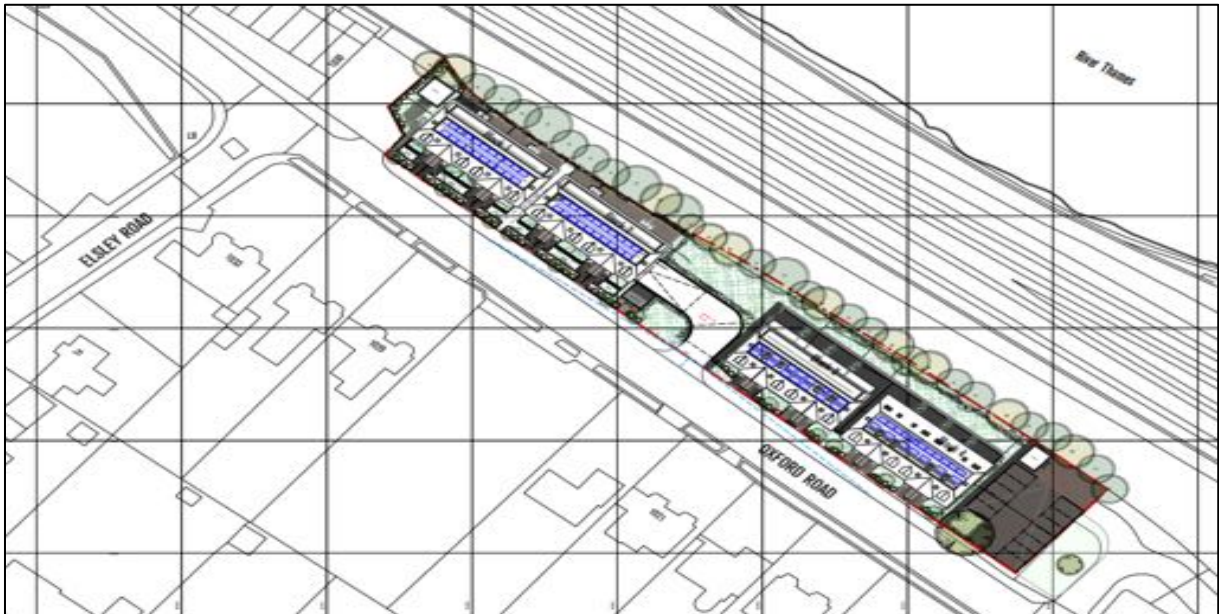


Image 9 – Proposed layout

- 6.45 The residential blocks 1 and 2 sit approximately 6m away from the public footpath and blocks 3 and 4 sit approximately 4m away from the public footpath along Oxford Road. The scheme allows for direct access from Oxford Road past the pedestrian walkway leading to the front door access

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- 6.46 Pedestrian access into the basement car parking is between blocks 2 and 3, whilst vehicular access is afforded via ramped access from Oxford Road, with suitable vision splays maintained. There is also provision for surface level car parking located to the right of the site boundary.
- 6.47 The external amenity spaces include a mix of private and shared spaces adjacent to the entrances of the units. The amenity to the rear can be accessed through a footpath between the ramp and block 3 and to the East between the car parking area and block 4.
- 6.48 The private amenity spaces to rear of the blocks 1 and 2 are accessed by the ground floor flats. Similarly, the private amenity spaces to the rear of blocks 3 and 4 are accessed by the ground floor flats. The landscaping to the rear of blocks 3 and 4 provide the residents with a shared amenity space.
- 6.49 The proposed internal spaces of the units are designed to comply with National Space Standards and also relevant Reading Borough Council National Local Planning policies.
- 6.50 Soft landscaping and promotion of habitat is an important component of successful place making. The proposal includes soft landscaping to the front of the buildings. The low-level planting maintains the site's openness from the existing street elevation and it is also a similar pattern to the relatively new development to the north west of the site.
- 6.51 The proposal is 2 storeys with 'accommodation within the roof space', taking architectural cues and lines from the neighboring property as shown below.



Image 10 – Existing street scene

6.52 The roof forms of the neighbouring properties have inspired the proposed design. The objective has been to create a proposal that respects the nature of residential properties. To accomplish this, the scheme has considered the site levels, the ridge heights of the proposed scheme are lower than the neighbouring on plots. The main roof is sloped back from the dwelling seen at the front elevation and also at the rear and side elevations. The architectural features highlighted are used to create a balance in the scale and form of the blocks – as outlined below.



Image 11 – Proposed street scene

6.53 The images above highlight that the proposed development accords with the character of the surrounding area. Sufficient space is also provided between properties to provide a welcome break in built form along Oxford Road.

Residential Amenity

6.54 Policy CC8 (Safeguarding Amenity) of the Reading Borough Local Plan states that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties. Image 11 above highlights the separation distance which will be maintained to the nearest properties to the northwest of the site at 1030-1040 Oxford Road. There will be no adverse impact on these properties because of the proposed development.

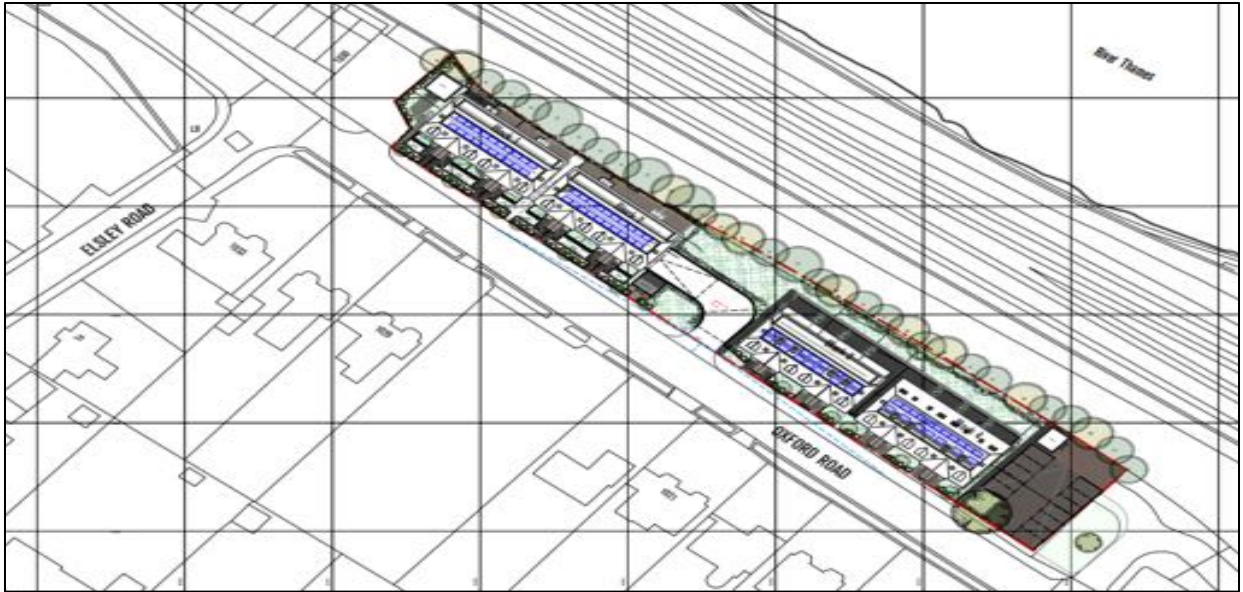


Image 12 – Development and relationship with adjoining properties

- 6.55 The proposed development retains a significant separation distance to the properties to the south of Oxford Road as shown above to ensure that there would be no adverse impact on these properties.
- 6.56 The proposed development also maintains significant separation to the properties immediately to the south-east of the site.
- 6.57 Overall, it is considered that the proposed development will not have an adverse impact on the residential amenity of the area.

Amenity of future occupiers

- 6.58 In addition to Policy CC8 above, Policies H5 (Standards for New Housing) and H10 (Private and Communal Outdoor Space) also apply. Policy H5 states that new build housing will need to comply with the nationally prescribed space standards. Policy H10 sets out that:

“Dwellings will be provided with functional private or communal open space wherever possible, that allows for suitable sitting-out areas, children’s play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.”

- 6.59 All dwellings will meet the nationally described space standards (as outlined in Policy H5) for the type of dwelling/number of bedrooms and the internal layout of the proposed units are arranged so as to create a suitable standard of living accommodation for future occupiers. It is considered that all dwellings would have good levels of outlook. The proposal follows the form of development which was accepted by the Council in the recent development of 1030-1040 Oxford Road.
- 6.60 All units are considered to be provided with adequate levels of privacy. The proposed dwellings fronting Oxford Road would have a 4-6 metre set back distance from the highway which is consistent with the established building line along Oxford Road and none of the properties are overlooked to the rear.
- 6.61 The external amenity spaces include a mix of private and shared spaces adjacent to the entrances of the units. The amenity to the rear can be accessed through a footpath between the ramp and block 3 and to the East between the car parking area and block 4. There are also more pockets of shared amenity spaces all around the site.
- 6.62 Owing to the site location within the defined settlement, the site is also located within walking distance of several parks and outdoor spaces as outlined below.



Image 13 – Outdoor amenity space in the immediate area

Accessibility

- 6.63 Policy H5(f) requires that on all developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in Part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'. The development includes this provision.

Environmental Protection matters

Air Quality

- 6.64 Policy EN15 (Air Quality) requires developments to have regard to the need to improve air quality and reduce the effects of poor air quality.
- 6.65 An Air Quality Assessment has been submitted in support of the application. The conclusions are that pollutant levels will not be above the limit values and therefore no mitigation is required. The assessment also concludes that traffic generation is unlikely to lead to increased pollutants, confirming no mitigation is required.

Noise

- 6.66 Policy EN16 (Pollution and Water Resources) states that proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution.
- 6.67 A Noise Assessment has been submitted with the application which outlines that the properties will be located within an established residential area where there are no significant noise generating uses to consider outside of the noise from passing traffic along Oxford Road.
- 6.68 To the front of the property, to the south of the site is Oxford Road and the proposed development will retain a separation distance of 6m to the highway. The separation distance provided will ensure that the proposed development will not be unduly affected by the noise from the passing traffic.
- 6.69 To the rear of the site is line of mature trees which separate the site from the railway. Once again, a significant separation distance is provided to the rear of the site to mitigate against any noise from the railway. The established line of mature trees in conjunction with the separation distance provided to the dwellings is sufficient to ensure that there will be no adverse impact on future occupiers.

- 6.70 It should be noted that the proposed development accords with the pattern of development to the northwest and southeast of the site. All along Oxford there are residential properties which front onto Oxford Road to the south and back onto the railway to the north. The proposal is no different in this regard.

Contaminated Land

- 6.71 The site is a vacant car garage that occupies a narrow-shaped area of approximately 0.33 hectares. On site are three brick-built buildings including a garage in the north-west, a car showroom in the central area and a car maintenance garage in the south-eastern portion. The surface surrounding the buildings was hard-standing comprising a mixture of reinforced concrete and bituminous paving, with no visible signs of surface staining. Both underground and above ground bulk fuel tanks were identified to be present on site.
- 6.72 Three above ground storage tanks (ASTs) were identified to be present on site. Several underground storage tanks (USTs) and 4 no vent pipes were identified to be present in the north-western portion of the site adjacent to the former car showroom. It would therefore appear that there might remain a number of underground tanks on site which have not been adequately decommissioned and require urgent removal.
- 6.73 EN16 (Pollution and Water Resources) required that developments on land affected by contamination can be satisfactorily managed or remediated against so that it is suitable for the proposed use.
- 6.74 A Contaminated Land Investigation Report prepared by WDE Consulting has been submitted with the application. This concludes that remediation will be needed due to the presence of some contaminants above guideline levels. It is considered that that this can be dealt with via suitably worded conditions subject to a grant of permission.

Transport and highways

- 6.75 Policies TR3 (Access, Traffic and Highway related matters), TR1 (Achieving the Transport Strategy) and TR5 (Car and Cycle Parking and Electric Vehicle Charging) seek to address access, traffic, highway and parking relates matters relating to development. The Revised Parking Standards and Design SPD sets out guidance in respect of parking provision.
- 6.76 The National Planning Policy Framework (NPPF) sets out the Government's planning policies and how they should be applied by local planning authorities / decision makers when firstly drawing up local development plans and when determining planning applications. Paragraph 115 states that:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

DTM PLANNING

- 6.77 The application is supported by a detailed Transport Statement (TS) which has been prepared to consider the transport impacts that may arise from the proposed development, and to consider the proposal against the relevant transport planning policy considerations, and the critical transport tests identified in paragraph 114 of the National Planning Policy Framework (NPPF).
- 6.78 The Reading Borough Council Revised Parking Standards (adopted October 2011) outline the vehicle and cycle parking guidance for all developments and how they can be designed and managed. The required parking standards relevant to the proposed development are set out in **table 1** below.

Number of bedrooms	Car Parking – Number of spaces	Cycle Parking
1 – 2	1.5	0.5
3	2	1

Table 1 – RBC Parking Standards

- 6.79 The standards note that “Should a developer require fewer spaces than are set out here then there would need to be demonstration, to the Highway Authority’s satisfaction, that there would be no detriment to highway safety as a result.”
- 6.80 The nearest railway station to the site is Tilehurst Station, located circa 300m east of the site. Tilehurst station can be accessed on foot within 3 minutes via the continuous footway that routes along the site frontage. Tilehurst station provides frequent and direct services to Reading, London Paddington and Didcot Parkway.

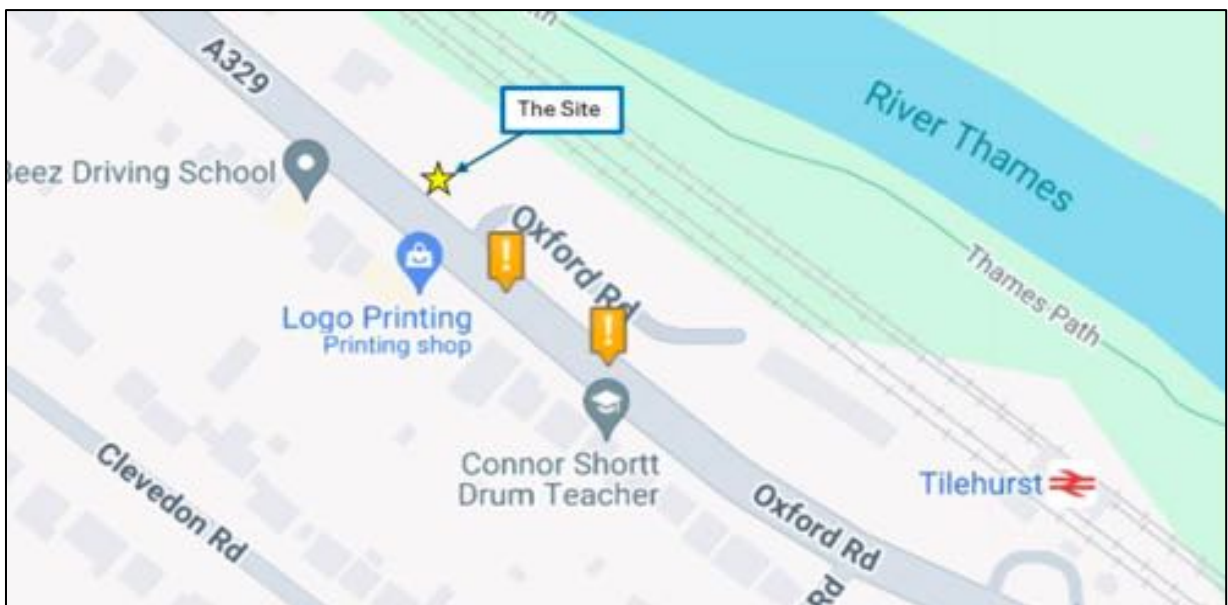


Image 14 – Proximity to Tilehurst Station

- 6.81 The site is closely located to a comprehensive and wide-ranging provision active and public transport connections. Roebuck Hotel bus stop is also situated approximately 100m west of the site, providing connections to Reading Retail Park and Reading town centre. School services are also provided at this stop.
- 6.82 As outlined in the Reading Local Plan, it is proposed to provide a new Mass Rapid Transport link along Oxford Road, which would directly benefit the site, by providing a new public transport location between Tilehurst and Reading.
- 6.83 Therefore, based on the current and future provision of active and public transport infrastructure in the locality, there are several genuine opportunities for future residents of the site to travel by non-car modes.
- 6.84 The proposed redevelopment of the Charters site comprises a total of 32 one, two, and three- bedroom flats, comprising 22 Privately Owned and 10 Affordable units.



Image 15 – Proposed layout

- 6.85 As shown above, vehicular access is proposed directly to the two car parking areas. As shown in Image 16 below, access to the basement car park will take the form of a new priority-controlled junction with Oxford Road. A further access is proposed to the car parking area associated with the eastern block via an existing priority junction.



Image 16 – New access proposed

6.86 The proposed priority junction has been designed in line with Manual for Streets (MfS) guidance and comprises the following:

- A 6.0m access road
- Visibility plays of 2.4m x 43m in both directions, based on a 30mph operational speed on Oxford Road
- A height restriction warning to be provided at the access.

6.87 An independent Stage 1 Road Safety Audit of the proposed access arrangement on Oxford Road has been undertaken. The Road Safety Audit and Designers Responses are provided in Appendix B of the supporting Transport Statement along with confirmation from the Auditor that all matters raised have been addressed satisfactorily at this stage.

6.88 The proposed development will be supported by 44 vehicle parking spaces (32 spaces within the basement car park and 12 spaces in the at grade car park). It is noted that this provision is not in line with RBC Parking Standards, which when applied to the proposed development generates a requirement of 58 spaces. However, a deviation from Parking Standards is permissible under specific circumstances. As stated in RBCs Parking Standards:

“Should a developer require fewer spaces than are set out here then there would need to be demonstration, to the Highway Authority’s satisfaction, that there would be no detriment to highway safety as a result.”

- 6.89 A review of Car/Van Ownership (obtained from 2021 Census data) for the Tilehurst North MSOA (in which the site is located) identifies that 85% of residents cumulatively have access to at least one/two/three or more cars/vans. Applying these percentage profiles to the proposed development of 32 flats, the parking requirement is 46 spaces. The total is marginally above the number of spaces proposed, but is an overly robust, worst-case assessment of parking, and does not consider the sites sustainable location and proximity to Roebuck Hotel bus stops and Tilehurst Railway Station. Therefore, it can be considered that the total parking provision proposed is appropriate.
- 6.90 Notably, it is highly unlikely that the proposed parking allocation will lead to parking overspill as parking controls (double yellow lines) are enforced on Oxford Road and the surrounding local highway. In addition, the site is in a sustainable location, with bus stops and Tilehurst Railway Station located within a 400m walking distance, (equivalent to a 3-minute walk), therefore providing genuine opportunities to travel by non-car modes. Therefore, the provision of parking proposed is appropriate to the scale of development at the site.
- 6.91 The RBC parking standards set out a minimum cycle parking requirement of 18 cycle spaces on the site. Accordingly, a secure cycle storage is proposed between Blocks 1 and 2, which will have capacity for 20 cycles. The provision therefore exceeds the minimum requirement and is appropriate to the scale of development proposed.
- 6.92 The proposed development is expected to have lower vehicular traffic generation than the existing use. It is forecast that during the AM Peak there will be a reduction of 6 vehicles and 2 in the PM Peak. The resultant generation will have an imperceptible impact on the local highway network, and therefore no further capacity testing on the local highway network is required.
- 6.93 Based on this, the proposed development will not have material impacts on highway safety or on capacity and/or congestion. In this context, the traffic impact NPPF test in Paragraph 114 and 115 is met and the development is therefore acceptable in highway and transport terms.

Natural Environment - Trees and Landscaping

- 6.94 Policy EN14 (Trees, Hedges and Woodland) seeks to extend the Borough's vegetation cover, and that development should make provision for tree planting whilst Policy CC7 (Design and the Public Realm) seeks proposal should include appropriate landscaping. Proposals should also demonstrate an appropriate level of greening and/or net gain in tree numbers.
- 6.95 The application site is currently covered in hard standing with minimal landscaping present. Therefore, the proposal will result in a net gain in tree numbers and a significant increase in landscaping.

- 6.96 The application is supported by an arboricultural statement and a landscape masterplan. The development of the site will involve the construction of 32 dwellings which, whilst not directly requiring the removal of any existing trees, has the potential to have an indirect impact on those trees proposed for retention. The development of the site as proposed will not directly require the loss of any trees.
- 6.97 Whilst there will be no loss in trees or canopy cover as a result of the development proposals, the development should nevertheless accord with Reading Borough Council's Tree Strategy and Policy EN14 of its Local Plan. The landscape proposals submitted with the application seek to enhance the canopy cover withing the site for the benefit of future generations and supports the principles of both the Tree Policy and Policy EN14, where the medium to long term impact of the development will be positive.
- 6.98 Further to the above, a landscape masterplan has been submitted with the application. This includes the provision of new trees. The proposals have incorporated tree planting within the proposed public open space as well as provision within parking areas. Other hedging and ground cover vegetation is provided throughout the site.

Ecology

- 6.99 Policy EN12 (Biodiversity and the Green Network) seeks that development should not result in a net loss of biodiversity and should provide for a net gain of biodiversity wherever possible by protecting, enhancing and incorporating features of biodiversity on and adjacent to development sites and by providing new tree planting and wildlife friendly landscaping and ecological enhancements wherever practicable.
- 6.100 To support this application an extended habitat survey and Initial Bat Survey & Preliminary Roost Assessment were undertaken on 21st August 2024. It concluded that there would be no adverse impact to any protected species as a result of the proposed development.
- 6.101 A Biodiversity Net Gain Assessment was also conducted. As defined under Schedule 7A of the Town and Country Planning Act 1990), developers must deliver a BNG of at least +10%. This means a development will result in more, or better quality, natural habitat than there was before development. The proposed development will provide a net gain of 19% which exceeds the requirements.

Sustainability and Energy

- 6.102 Policy CC2 (Sustainable Design and Construction) and Policy CC3 (Adaption to Climate Change) seeks that development proposals incorporate measures which take account of climate change. Policy CC4 (Decentralised Energy) seeks that developments of more than 20 dwellings should consider the inclusion of combined heat and power plant (CHP) or other form of decentralised energy provision.

- 6.103 Policy H5 (Standards for New Housing) and the Council's Sustainable Design and Construction SPD (2019) identify that, as a minimum, new dwellings should achieve 35% improvement in regulated emissions over the Target Emissions Rate (TER) in the 2013 Building Regulations, with financial contribution required to off-set any remaining carbon emissions to zero.
- 6.104 Our client has submitted an energy and sustainability report as part of the application which follows the relevant policies and Sustainable Design and Construction SPD guidance applying the recognised energy hierarchy of 'be lean', 'be clean' and 'be green'.
- 6.105 The Statement includes an energy strategy showing how selected energy efficiency, low carbon and renewable energy measures have been considered and those, which have been incorporated into the proposals.
- 6.106 SAP calculations have been prepared for representative units based on Part L 2021. These have used the construction specification set out in the Statement and the detailed planning drawings. The fabric insulation standards and the construction specification of the apartments will exceed the minimum required by the Building Regulations.
- 6.107 Whilst various technologies are considered appropriate it is proposed to install exhaust air heat pumps into each apartment. In addition, the crown roof of each of the four blocks includes the installation of photovoltaic panels. It is proposed to install 20 panels on each of Blocks 1 and 2, 14 panels on Block 3 and 18 panels on Block 4. The benefit of the panels is attributable to the apartments within the block in question based on their floor area.
- 6.108 The residual emissions from the site are 7.128 tonnes of CO₂ and the water efficiency standards for the apartments will be less than 110 litres per person per day (including 5 litres for external water use).

7.0 The Planning Balance and Conclusions

Policy WR3r of the Local Plan 2019

- 7.1 The site is allocated under Policy WR3r of the Local Plan 2019, which states that development should:
- Provide access to the site from Lippincote Court
 - Avoid adverse visual impacts on views from the north side of the Thames and on the Thames Valley major landscape feature
 - Avoid detrimental impacts on the wildlife value of adjoining wooded areas
 - Address air quality impacts on residential use
 - Address noise impacts on residential use
 - Address any contamination on site, and
 - Take account of the two-storey character of houses south of Oxford Road.
- 7.2 The first requirement of this policy seeks one access point on a site that is over 100m in length. Any proposal with access only from Lippincote Court would be forced to use a significant portion of the site for an access road and parking area. To do so would represent a gross misuse of a suitably located brownfield site. For this reason, a second access is proposed to serve the northwestern section of the site.
- 7.3 In terms of scale. The proposed development accords with the development to the northwest of the site to ensure that the impacts on views from the north side of the Thames and on the Thames Valley will be negligible.
- 7.4 In terms of wildlife and landscaping. The environmental reports submitted in support of the application have demonstrated that there will be no detrimental impacts on the wildlife value of the site or the adjoining wooded areas.
- 7.5 An air quality report, a noise report and a contamination report have been prepared to support the application and conclude that the proposal development is acceptable.
- 7.6 The final point of policy WR3r requests that the proposal respects the two-storey character of the properties to the south of Oxford Road. It is unusual that the policy mentions the properties to the south of the site rather than the adjoining properties to the northwest. Nonetheless, the proposal has been designed with the surrounding properties in mind.

- 7.7 Therefore, the proposal fully accords with 6 of the 7 criteria outlined for the development of the site. The requirement for the site to be serviced via Lippincote Court alone would make the development of the site completely unviable and this not been complied with in full. However, the transport statement and road safety audit carried out in support of the application outlines that the proposed new access is acceptable in highways terms.
- 7.8 However, the most concerning element of the policy is the suggested density of 12-18 dwellings on site. Which would also require that 30% of such units came forward as affordable units. This housing projection from 2019 represents a gross underdevelopment of the site and is unacceptable for many reasons.
- 7.9 The policy is correct in its allocation of the site as a site for housing as it accords with the surrounding land uses, but the density of development is far too low having regard to the sites context and location.
- 7.10 The site, by virtue of its long and narrow shape is unsuitable for family type homes. The depth in particular dictates that the most suitable development option for the site is for flats as outlined in detailed in the design section above.
- 7.11 The site is located in a highly sustainable location, 300m from Tilehurst Station. The site is also closely located to a comprehensive and wide-ranging provision active and public transport connections. Roebuck Hotel bus stop is also situated approximately 100m west of the site, providing connections to Reading Retail Park and Reading town centre. School services are also provided at this stop.
- 7.12 As outlined in the Reading Local Plan, it is also proposed to provide a new Mass Rapid Transport link along Oxford Road, which would directly benefit the site, by providing a new public transport location between Tilehurst and Reading.
- 7.13 Furthermore, the contamination report prepared in support of the application outlines the significant remediation that will be involved before the site can even be developed. The costs associated with remediation are significant and will affect the viability of developing the site. Therefore, the provision of 12 – 18 units, with 30% affordable is simple not viable. It was not viable in 2019 when the plan was adopted, and it certainly not viable today.
- 7.14 Instead of providing a viability statement to support a much lower number of units, our clients have sought maximise the development potential of the site and provide a policy compliant level of affordable housing instead. Therefore, Officers will need to weight up the significant affordable housing benefits in the planning balance when assessing the application against policy WR3r.

Current Local Plan Background

- 7.15 It needs to be considered that the preparation of the current local plan started in March 2016 and the Reading Borough Local Plan was officially adopted on 4th November 2019, nearly 5 years ago. This document sets out the planning policies for development in Reading up to 2036, and is the main consideration in deciding planning applications, and includes policy WR3r.
- 7.16 Since the adoption of the Local Plan there have been significant impacts not only to the UK economy, but worldwide. The global issues the Country is currently facing, which were unforeseeable at the time the Local Plan was adopted, include;
- Brexit 2016
 - Covid 19 pandemic of 2019 – 2023
 - Russia / Ukraine conflict
 - War in the Middle East and associated disruption to the Red Sea trade routes.
- 7.17 As a result, the UK is in a very different position than it was in 2019. Brexit in particular has had a significant impact on the UK construction industry. As a result of Brexit, the cost of labour and materials have increased more steeply in the UK than in the EU. Analysis shows that, between 2015 and 2022, the cost of construction materials increased by 60% in the UK, whereas they rose only 35% in the EU.
- 7.18 Furthermore, before Brexit, 40% of construction workers in the UK came from other EU countries. The end of free movement means there is an even greater shortage of skilled workers, making it harder for companies to recruit and driving up the labour costs of construction projects. A shortage of labour drives labour costs higher, which increases overall construction costs.
- 7.19 With materials, there remains an ongoing risk to price inflation due to uncertainty around disruption to trade routes in the Red Sea and conflict in the Middle East and Ukraine.
- 7.20 In Planning Policy Terms the National Planning Policy Guidance has been updated July 2021 and updated in September 2023, and the new Labor Government proposing further significant changes to be announced shortly. In her first speech as the new Chancellor of the Exchequer Rachel Reeves stated that Labour promised to grasp the nettle of planning reform, seeing the planning system as “antiquated” and “as a graveyard of economic ambition”.
- 7.21 The speech clearly outlined the new government’s stated mission to “kickstart economic growth” with the planning system as part of this. It was outlined that several planning policy changes, some of which were to be made immediately and others to be delivered very shortly, including a return to centralised housing targets to “get Britain building again”. She confirmed that Labour planned to build 1.5 million homes in England over the course of the parliament. This breaks down to 300,000 new homes per year over a 5 year parliamentary term.

- 7.22 Green Belt boundaries will be reviewed to prioritise brownfield and grey belt land. However, the initial Government statement does not exclude “greenfield sites” from the review which local communities often fight hard to protect. This indicates a serious threat to greenfield development will be part of the new Governments planning measures, a further reason why the development of brownfield sites such as the subject site need to be maximised.
- 7.23 The above provides some context to the current political situation of the UK and the construction industry and it is hoped that Officers will have regard to this when deciding this application. For the reasons outlined above, the development of this site for a maximum of 18 units is not an efficient use of the land and is therefore contrary to the proper planning of the area.

National Planning Policy Framework

- 7.24 The National Planning Policy Guidance has been updated July 2021 and updated again in September 2023, but one of the key guidelines is once again, to prioritise the development of sustainably located brownfield sites.
- 7.25 The NPPF seeks to ‘boost significantly the supply of housing’ and deliver a wide range of homes, of different types and tenures. Achieving an efficient use of the land within the context of any central and sustainability located site is a key priority both at a national and local level. The NPPF states that LPAs should actively “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”. The subject site is not of high environmental value, and it is located in a highly sustainable location. Having regard to guidance contained in updated NPPF 2023, there is strong support for an ambitious approach to density on such sites.

Viability

- 7.26 It is clear that the Councils requirement for a scheme of 18 units with a provision of 30% affordable housing is simply not realistic in the current financial climate. It may have been realistic when the Local Plan was adopted in 2019 but owing to rising build costs and lower house values, it is simple not feasible for this site to come forward at 18 units or 54 dwellings per hectare and to provide a policy compliant level of affordable housing.
- 7.27 The contamination reports prepared in support of the application outline the significant works that will be needed just to make the site developable. This is another factor which was not considered when the initial allocation was made.

- 7.28 All of the above factors, particularly Brexit were not in place when the Local Plan was adopted. Therefore, the Council has a choice to make, does it accept a scheme which provides an increased number of units but with a policy compliant level of 10 affordable housing units, or will it force our clients to submit a scheme for a lower number of units with considerably less affordable units. Recent Policy changes at National Level supports the former option.
- 7.29 The proposal would provide a residential scheme on land allocated for housing within the Local Plan. The proposal would contribute to meeting the Borough's identified housing need and in particular the proposed 30% on-site Affordable Housing.
- 7.30 In design terms, the proposal is considered to positively improve the character and appearance of the site and wider area. On-site tree planting, biodiversity measures and landscaped amenity areas will provide visual and environmental benefits to the immediate area, improving the ecology of the site. The proposal is considered to make an effective and efficient use of the land in a highly sustainable location.
- 7.31 Overall, the proposals would be a positive addition to the regeneration of the wider Oxford Road area. The proposals are considered to be acceptable within the context of national and local planning policies, as detailed in the appraisal above.

